

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

KEITH JOHNSON

No. 19-40024-TSH

**UNOPPOSED MOTION FOR AN ORDER PERMITTING PARTICIPATION
IN THE RESTORATIVE JUSTICE PROGRAM**

Defendant Keith Johnson respectfully requests an Order from the Court permitting him to participate in the Restorative Justice program (RJ) program operated by the U.S. Probation Department. As grounds for the request, Mr. Johnson states:

1. The Probation Office provides the following description of the program:

Restorative Justice is a theory of justice that emphasizes a meaningful acceptance of responsibility for a crime or harm committed and making amends for that harm through transformational processes. The required parts of the Restorative Justice program are to complete an individual informational session and participate in a 16-hour workshop.

The 16-hour workshop is a demanding experiential process that includes defendants/participants, victims of crime, community volunteers, and Court family members. Participants engage in individual and group work, lectures, cognitive behavioral exercises, and homework. During the workshop participants: identify and analyze their values; review their behaviors in relation to their values; consider the reasons why they committed the crime (including exploration of criminogenic needs and trauma); identify and process the harm that their crime has caused; and explore potential ways in which they may

make amends. The victims of crime, community and Court family members work with each participant individually and in groups to expand their understanding of crime and its impact on others and accountability. The workshop is both emotionally and intellectually taxing, consistently emphasizing the importance of a meaningful acceptance of responsibility and making amends.

2. Undersigned counsel has spoken with the RJ Coordinator, who advises that a session of the program is scheduled to begin at Wyatt, where Mr. Johnson is incarcerated, in September, 2022 or soon thereafter. Probation states that it can consider Mr. Johnson's participation once the Court issues an order permitting it to do so.
3. The government advises that it takes no position on Mr. Johnson's potential participation in Restorative Justice.

Respectfully submitted,

KEITH JOHNSON
by his attorneys,

/s/ Amy Barsky
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Certificate of Service

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on September 7, 2022.

/s/ Amy Barsky
Amy Barsky